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May 10, 2023

BY ECF

The Honorable Vera M. Scanlon
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Henkin, et al. v. Qatar Charity, et al.*, 1:21-cv-05716-AMD-VMS

Dear Magistrate Judge Scanlon:

We write on behalf of Defendants Masraf Al Rayan (“MAR”) and Qatar Charity (“QC”) in the above-captioned action further to Your Honor’s order dated April 5, 2023 for a joint letter with a detailed proposed schedule for discovery. We respectfully request an adjournment of this deadline, as well as the discovery conference scheduled for May 16, 2023.

On March 31, 2023, Judge Donnelly denied MAR’s and QC’s motions to dismiss without prejudice to Defendants renewing their motions if discovery did not substantiate plaintiffs’ assertion of personal jurisdiction. (ECF No. 81). Earlier today, MAR and QC each filed letter motions for pre-motion conferences seeking to renew their respective motions to dismiss pursuant to Judge Donnelly’s Individual Practices and Rules in light of unauthorized discovery taken by Plaintiffs of non-party Bank of New York Mellon. That discovery was provided yesterday, May 9, 2023.¹ Copies of those letters are attached hereto.

This is Defendants’ first request for an adjournment. With the Court’s permission, Defendants propose providing suggested adjournment dates that suit all parties following resolution of MAR’s and QC’s letter motions if a rescheduled conference is appropriate. Plaintiffs do not consent to this request.

¹ Because the parties were not in receipt of the unauthorized discovery within two business days of today’s deadline, Defendants were unable to seek an extension no later than two business days in advance of the deadline.

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Respectfully submitted,

/s/ Carolina A. Fornos

Carolina A. Fornos

Aryeh L. Kaplan (*pro hac vice*)

Counsel for Defendant Masraf Al Rayan

cc: All counsel of record (by ECF)